



August 30, 2019

Comments - Focal Species
Prescott National Forest SO
2971 Willow Creek Rd Bldg 4
Prescott, AZ 86301

Submitted by e-mail: comments-southwestern-prescott@usda.gov
Subject: Comments - Focal Species

Attention: Francisco Anaya, Project Lead

Yavapai Group and Sierra Club's Grand Canyon Chapter (Sierra Club), as well as Great Old Broads for Wilderness (Broads) believe in clean water, and healthy wildlife habitat. We desire to prevent any future environmental damage to our public lands and to protect our beloved wildlife and landscapes.

Sierra Club's Grand Canyon Chapter has more than 60,000 members and supporters in Arizona. Yavapai Group is part of the Grand Canyon Chapter. Sierra Club's mission is "to explore, enjoy, and protect the wild places of the earth; to practice and promote the responsible use of the earth's ecosystems and resources; and to educate and enlist humanity to protect and restore the quality of the natural and human environments." Sierra Club has long been committed to protecting public lands and their ecological health and so they are available for future generations to enjoy. Our members have a significant interest in the Prescott National Forest (PNF). Our members and supporters enjoy a wide range of recreational activities in the area, including wildlife viewing, hiking, backpacking, camping, and more.

Great Old Broads for Wilderness (Broads) is a national non-profit grassroots organization established in 1989. We are advocates, stewards, and educators for the preservation and protection of wilderness and wild lands. Wild places, once destroyed, may be gone forever. (Wild places are those where plants, wildlife, and natural processes function with vitality, biodiversity, and service to the planet.)

We appreciate PNF leadership's effort to improve the focal species selections in the Forest Plan. In response to your request for comments on administrative corrections to focal species in the current Forest Plan, Sierra Club and Broads provide you with the following concerns.

General Concerns:

We suggest that the Forest could have consulted scientists who understand ecological monitoring, in addition to PNF staff experts, to help develop the proposals. We are grateful to Walt Anderson, a retired Prescott College faculty in Ecology and Natural History who is intimately familiar with this area, for assistance with these comments.

We suggest that PNF explicitly acknowledge and use data gathered by other agencies (eg: Arizona Game and Fish Department, US Fish and Wildlife Service, and Sierra Club) to broaden the scope and quality of PVNT assessments.

We are critical of the concept of a single "focal species" because individual species counts can fluctuate widely from year to year (due to both local and remote factors) so that a given sampling protocol (in this case, once every 1 - 5 years depending on species) can have so much "statistical noise" (especially if sample size is small) that it is difficult to draw useful conclusions. Also, most of the standards and guidelines for terrestrial wildlife in the Forest Plan are extremely vague, so relying only on a focal species will not necessarily "... ensure that Southwestern Region sensitive species do not trend toward listing as threatened or endangered species."

Riparian Gallery Forest PVNT: propose to replace macroinvertebrates with song sparrow.

The gallery forest along the Verde River above Clarkdale is unique and incredibly important to the ecology of the Southwest. The rationale for change and the revised Forest Plan documents the threats to this ecosystem: "...the spread of nonnative, invasive species, soil compaction, and loss of understory vegetation from high use ...". The Sierra Club does not agree that a single focal species is adequate to indicate management actions needed to redress this range of threats.

During the development of the current forest plan, we vigorously objected to the selection of macroinvertebrates as "...MIS species for aquatic and riparian habitat..." as inadequate because, although macroinvertebrates can be an indirect indicator of water quality, a) there are direct measures of water quality readily available, and b) the vital riparian zone along the upper Verde River cannot be properly assessed by water quality alone.

The Sierra Club supports the removal of macroinvertebrates. We suggest that PNF should instead rely on direct water quality measurement data from the Arizona Department of Water Quality, as provided by the Sierra Club Water Sentinels.

However, intermittent song sparrow counts are not adequate. Song Sparrow is a brush- or thicket-loving species. It does occur in brushy thickets under cottonwoods and willows, but those trees could disappear without affecting them, as they more often occur in marshy situations with cattails, bulrush, seepwillow (a composite), and dense coyote willow or even tamarisk! This is a very questionable choice if you care about cottonwood, tree willows, ash, boxelder, alder, etc. Song Sparrows are great for indicating stream- or pond-margin thickets, but the type description doesn't mention that. Yellow Warblers are more tied to the taller trees with dense understory vegetation than Song Sparrows. Contrary to the rationale, it would be no additional work to count both bird species during monitoring sessions. Furthermore, while counting birds, the presence of non-native invasive vegetation can be noted, especially tamarisk.

The most serious threat is another non-native invasive species: cattle. The single best indicator of Riparian Gallery Forest health is the absence of cattle. It is well known that grazing has serious impacts on all riparian vegetation, stream banks, and water quality. We are all aware that trespass grazing is a problem on the Verde River reach above Clarkdale, and it is a severe problem along the Verde Wild and Scenic River. If cattle are not present, the riparian vegetation is extremely resilient and needs little management other than control of non-native vegetation.

The Sierra Club suggests that the absence of trespass cattle grazing should be the most important focal species in this PVNT. Monitoring is easy: walk the river and notice clipped vegetation, hoof prints, manure, and trampling. Sierra Club volunteers are available to assist with this monitoring.

Ponderosa Pine/Oak PVNTs: propose to replace Northern Goshawk with woodpecker and nuthatch species.

Northern Goshawk is a sensitive species, so PNF (and/or AZGFD and USFWS) must continue to monitor and protect critical habitat. The presence of Acorn Woodpeckers and nuthatches is no guarantee that sensitive species like raptors are maintained. The three species of nuthatches have different preferred habitats. The Red-breasted Nuthatch, which prefers mixed-conifer forests, can be an irruptive species that moves south and down-slope in large numbers some years, which can throw survey data way off. Pygmy Nuthatches are most closely associated with Ponderosa Pines. Acorn Woodpeckers are dependent on acorns, which means oaks, so pines could be increasing or decreasing, and that species might not give a hoot. Using all three nuthatch species is necessary to monitor this PVNT.

Grasslands PVNTs: replace scrub jay with meadowlarks

The two meadowlark species are grassland birds. Grazing intensity is probably the limiting factor for their presence or absence in these PVNTs because meadowlarks need good grass cover. This change is acceptable, but we will be concerned if management includes removing junipers and pinyons that serve many other species of birds.

Revised Forest Plan: Miscellaneous Errata

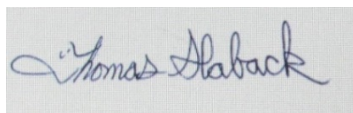
The description at the top of page 42 of the revised forest plan needs correction: "*Common species include Fremont cottonwood, narrowleaf, Gooding and Bebb willow, Arizona sycamore, velvet and green ash, Arizona alder, Arizona walnut, and box elder.*" "Narrowleaf" is not a species in its own right; it should be narrowleaf cottonwood. "Gooding" is the correct spelling for that willow, not "Gooding." Other common willows (e.g., red, arroyo, coyote) are not mentioned. "Green ash" should not be mentioned, as it is an eastern species.

Pages 2, 10, 39, 48, 67, 84, 166, and 168 commit the biological error of using the word "antelope" after pronghorn.

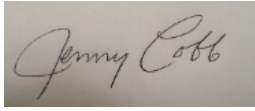
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A rectangular box containing a handwritten signature in cursive that reads "Jenny Cobb".

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A handwritten signature in cursive that reads "Sandy Bahr".

Sandy Bahr
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